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**US DISTRICT COURT NEVADA
DISTRICT OF NEVADA**

KIM BLANDINO

Case No. 2:21-cv-01262-JAD-EJY

Plaintiff,

-vs

MICHAEL FEDERICO ESQ., et al.,

Defendants.

/

UNOPPOSED MOTION FOR EXTENSION OF TIME IN WHICH TO

FILE OPPOSITION TO MOTION TO DISMISS

(First Request)

Comes Now Plaintiff Kim Blandino (“Kim”) to move this court for an extension of time to January 4, 2023 to file an Opposition to Defendant Federico’s Motion to Dismiss. Defendant Federico does not oppose this motion.

POINTS AND AUTHORITIES

1. On November 21, 2022 Kim filed a first amended Complaint (ECF 38) adding a party that new facts revealed that this party needed to be added to this action. That Kim was only released from a 45 day imprisonment in CCDC and was released on October 31, 2022. On December 1, 2022 Defendant Federico filed a Motion to Dismiss ECF 39) For the reasons below Kim requests a (20) day extension or until January 4, 2023 to file an opposition to defendant Federico's motion.
2. That Kim is a 24/7 caretaker for Evelyn Pendergraft (Evie) who is (97) years old a WWII veteran and widow and lost her only son in 2013 to a botched hospital operation. That Kim vowed to God to take care of Evie until the end of her days. That because of Kim's wrongful jailing for these above days Evie was subjected to a hospital stay and short term recovery. That Evie's health is deteriorating steadily which requires Kim to take even more intensive care of Evie which takes even more and more of Kim's time available to do this legal work. That Evie routinely wakes Kim up in the middle of the night for care and Kim's sleep and rest is very disrupted which takes away from Kim's time to prepare legal documents.
3. That Kim is having to fight additional legal battles as a direct result of Defendant Mead's violations of Kim's rights Kim is facing charges in Las

Vegas Township Justice Court Nevada v. Blandino 22CR41030. One of which is a felony. Kim has and had no choice but to file for Emergency relief and filed an Emergency petition with the Nevada Supreme Court which has been split into two petitions Cases 85764 and 85765.

That Kim as a result of this jailing and now Kim's age (Kim is over 67 outside the womb and Kim is slowing down in his ability and the "wear and tear" to perform as in his younger days.

4. This requested extension will permit Kim to thoroughly and adequately respond . This is Kim's first request for an extension to oppose the motion to dismiss and is not made for the purposes of delay nor in bad faith. But rather for justice to prevail.

5. Finally the present request is unopposed. On December 14, 2022 Kim called counsel for Federico, Peter Angulo via the telephone and Mr. Angulo related that he does not oppose and has no objection to this date and request.

WHEREFORE, Kim respectfully requests that this Court grant the request for an extension of time to file an opposition to Defendant Federico's motion to dismiss to January 4, 2023

Dated this 15th day of December, 2022.

Respectfully submitted,


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IT IS SO ORDERED:


Layna J. Zouchah
United States Magistrate Judge

Dated December 15, 2022